

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No. 1:13-cv-12927

JOHN BRADLEY,

Plaintiff,

v.

TIMOTHY J. CRUZ (Individually),
MICHAEL HORAN (Individually),
FRANK J. MIDDLETON (Individually),
AND OFFICE OF THE DISTRICT
ATTORNEY FOR PLYMOUTH
COUNTY,

Defendants.

JOINT PROPOSED SCHEDULING ORDER FOR
SUMMARY JUDGMENT BRIEFING ON ISSUES OF LIABILITY

The parties hereby propose the following timetable for summary judgment briefing on issues of liability:

1. Summary Judgment Briefing on Issues of Liability:

- a. Moving Party (or Parties) to produce DRAFT Local Rule 56.1 Statement of the Material Facts of Record by January 6, 2016.
- b. Responsive Motions to Impound material included in the DRAFT Local Rule 56.1 Statement of the Material Facts of Record by must be filed **UNDER SEAL** by January 20, 2016.
- c. Motion for summary judgment on issues of liability must be filed by January 21, 2016 or thirty (30) days after the Court's ruling on Motions to Impound under subsection (c), whichever is sooner.
- d. Opposing Party or Parties to produce DRAFT Opposition to Local Rule 56.1

Statement of the Materials Facts within thirty (30) days following service of motion for summary judgment.

- e.** Responsive Motions to Impound material included in the DRAFT Opposition to Local Rule 56.1 Statement of the Material Facts of Record by must be filed **UNDER SEAL** within fourteen (14) days.
 - f.** Opposition to motions for summary judgment on issues of liability must be filed thirty (30) days after the Court's ruling on Motions to Impound.
 - g.** Replies to oppositions to motions for summary judgment on issues of liability must be filed within fourteen (14) days following service of opposition.
- 2.** Parties respectfully request the opportunity for oral argument on any motions for summary judgment on issues of liability.
 - 3.** Parties agree that expert discovery (if any) and summary judgment briefing on damages shall begin (if at all), immediately after the Court's ruling on liability.

Respectfully submitted,

TIMOTHY J. CRUZ, MICHAEL HORAN, FRANK
J. MIDDLETON, and the OFFICE OF THE
DISTRICT ATTORNEY FOR PLYMOUTH
COUNTY

Defendants,

By their attorney,

MAURA HEALEY
ATTORNEY GENERAL

By: /s/ Bret A. Cohen

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JOHN BRADLEY,

Plaintiff,

By His Attorneys,

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Dated: October 21, 2015

LOCAL RULE 7.1(A)(2) CERTIFICATION

I hereby certify that, on October 21, 2015 counsel for the Parties conferred in good faith to the contents of this schedule.

By: /s/ Bret A. Cohen

Dated: October 21, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically via the Court's CM/ECF system on October 21, 2015, which thereafter provided notice and service to all parties. Parties may access this pleading through the Court's electronic docketing system.

By: /s/ Bret A. Cohen